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FILED 11 MAY 23 11:40 USDC-ORM

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION**

DENISE and KENNETH COOK,

Case No. 10-CV-3121-PA

Plaintiffs,

v.

**BENEFICIAL OREGON INC., a Delaware
Corporation;**

**SHAPIRO & SUTHERLAND, LLC, a
Washington State LLC;**

Defendants.

**Plaintiff's Verified
MOTION FOR SANCTIONS
Against defendant Beneficial
Pursuant to Fed. R. Civ. P. 11(c)**

I. CERTIFICATION

Pursuant to Local Rule 7-1(a), Plaintiffs certify that they have made a good faith effort through telephone conference to resolve the dispute and have been unable to do so.

II. MOTION

Pursuant to Fed. R. Civ. P. 11(c), Plaintiff's Kenneth and Denise Cook move this court for an order of sanctions against defendant Beneficial.

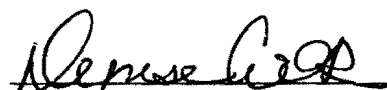
Defendant Beneficial has made numerous pleadings (including most recent document sent directly by council David A. Weibel to presiding Judge Panner of the court for this case dated May 9, 2011, hereinafter "*Claim of Note*" which are contradictory and unverified, and otherwise shown to be


false. Most recently, the "*Claim of Note*" just submitted by defendant Beneficial contradicts defendant's previous "Phyllis Johnston declaration" (dkt #29 and dkt #29-1).

Plaintiff's contend that by defendant Beneficial's consistent and repeated mis-representations to the court defendant is perpetrating fraud upon the record and fraud upon the court.

Plaintiff's motion is supported by its Memorandum of Law which is attached.

Dated this 21 day of May, 2011.


Denise Cook.


Kenneth Cook.